

REMARKS / DISCUSSION OF ISSUES

Claims 1-18 are pending in the application. Claims 11-18 are newly added.

The applicants thank the Examiner for acknowledging the claim for priority and receipt of certified copies of all the priority document(s), and for informing the applicants that the drawings are acceptable.

The Office action rejects claim 9 under 35 U.S.C. 112, second paragraph. Claim 9 is correspondingly amended herein.

The Office action rejects claims 1-10 under 35 U.S.C. 103(a) over Feldman et al. (USPA 2002/0142504, hereinafter Feldman), Ryan et al. (USP 6,061,039, hereinafter Ryan), and Amagami et al. (USP 5,402,149, hereinafter Amagami). The applicants respectfully traverse this rejection.

Claim 1, upon which claims 2-10 depend, claims a display device that includes a first substrate having groups of pixels, and a plurality of semiconductor integrated circuit (IC) devices that are fabricated on a second substrate and positioned within defined areas of the group of pixels, wherein each semiconductor IC device receives image data based on a first resolution that is substantially independent of the display device, and drives pixels within the associate group based on a second resolution corresponding to the display device.

In *KSR Int'l. Co. v. Teleflex, Inc.*, the Supreme Court noted that the analysis supporting a rejection under 35 U.S.C. 103(a) should be made explicit, and that it is "important to identify a reason that would have prompted a person of ordinary skill in the relevant field to combine the [prior art] elements" in the manner claimed:

"Often, it will be necessary ... to look to interrelated teachings of multiple patents; the effects of demands known to the design community or present in the marketplace; and the background knowledge possessed by a person having ordinary skill in the art, all in order to determine whether there was an **apparent reason** to combine the known elements in the fashion claimed by the patent at issue. To facilitate review, this analysis should be made explicit." *KSR*, slip op. at 14 (emphasis added).

The applicants respectfully maintain that there is no apparent reason to combine the teachings of Feldman and Ryan in the manner proposed in the Office action. The Office action notes that Feldman teaches a driver 70 that is configured to drive a plurality of pixels, and that Ryan teaches a plurality of IC devices that drives pixels, then asserts that it would be obvious to modify Feldman's device based on Ryan's teachings. The applicants respectfully disagree with this assertion, because Ryan explicitly teaches placing logic devices and drivers at each pixel.

The Office action asserts that one of skill in the art would have a reason to combine Feldman and Ryan "in order to allow the device of Feldman to address a particular display element among the plurality of the display elements of the device easily by providing computing capabilities of a IC semiconductor at each of the display elements." This asserted reason is contrary to Feldman's teaching of placing IC devices that drive a plurality of pixels. That is, as the Office action notes, if one were to apply Ryan's teachings to Feldman, one would be led to "providing computing capabilities... at each of the display elements", which teaches away from providing computing capabilities for a plurality of display elements, as specifically claimed by the applicants.

Further, even assuming in argument that one were to combine Feldman, Ryan, and Amagami, the combination would not lead one to the applicants' claimed invention. The combination of Feldman, Ryan, and Amagami does not teach or suggest a display device that includes a first substrate having groups of pixels, and a plurality of semiconductor integrated circuit (IC) devices that are fabricated on a second substrate and positioned within defined areas of the group of pixels. Additionally, Ryan specifically teaches away from mounting IC devices from one substrate onto a display substrate, and specifically teaches creating the IC devices and the display during the same fabrication process:

"A method of manufacturing a display module, including the steps of: providing a substrate; and forming on the substrate using the same manufacturing process an image display having an array of addressable display pixels and pixel driver circuitry responsive to control signals and image data for driving the pixels" (Ryan's Abstract).

Because there is no apparent reason to combine Feldman, Ryan, and Amagami in the manner suggested by the Office action, and because the combination of Feldman, Ryan, and Amagami fails to teach or suggest the elements of claim 1, and because Ryan specifically teaches against the claimed invention, the applicants respectfully request the Examiner's reconsideration of the rejection of claims 1-10 under 35 U.S.C. 103(a) over Feldman, Ryan, and Amagami.

In view of the foregoing, the applicants respectfully request that the Examiner withdraw the objection(s) and/or rejection(s) of record, allow all the pending claims, and find the application in condition for allowance. If any points remain in issue that may best be resolved through a personal or telephonic interview, the Examiner is respectfully requested to contact the undersigned at the telephone number listed below.

Respectfully submitted,

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